

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA,

-against-

KEONNE RODRIGUEZ and WILLIAM  
LONERGAN HILL,

Defendants.

Case No.: 24 CR. 82 (RMB)

**DEFENDANTS' NOTICE OF MOTION TO DISMISS INDICTMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law the undersigned will move this Court before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York 10007, for an order dismissing the Superseding Indictment.

PLEASE TAKE FURTHER NOTICE that upon prior order of the Court, answering papers, if any, shall be served on or before June 26, 2025, and any reply papers shall be served on or before July 10, 2025, with argument to be heard on July 22, 2025, at 1:00 p.m.

Dated: May 29, 2025

Respectfully submitted,

*/s/ Roger A. Burlingame*  
Roger A. Burlingame  
Matthew L. Mazur  
DECHERT LLP  
Three Bryant Park  
1095 Avenue of the Americas  
New York, NY 10036  
(212) 698-3500  
roger.burlingame@dechert.com

*/s/ Michael Kim Krouse*  
Michael Kim Krouse  
William T. Sharon  
Maya Kouassi  
ARNOLD & PORTER  
KAYE SCHOLER LLP  
250 West 55th Street  
New York, NY 10019-9710

matthew.mazur@dechert.com

(212) 836-8000

michael.Krouse@arnoldporter.com

*Counsel for Defendant William Lonergan Hill*

Anthony J. Franze (*pro hac vice* pending)

ARNOLD & PORTER

KAYE SCHOLER LLP

601 Massachusetts Avenue, NW

Washington, DC 20004

(202) 943-6479

anthony.franze@arnoldporter.com

*Counsel for Defendant Keonne Rodriguez*